

April 21, 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASUNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: v1 DEPUTY

CASE NO.: 25-00291

OSWALDO BARRIOS, on behalf of himself and
all others similarly situated,

Plaintiff,

vs.

INSTALLATION SQUAD, LLC; MASTEC
NETWORK SOLUTIONS, LLC;
BERNARDO NAPOLES; and ANGEL
RINCON,

Defendants.

/

**DEFENDANT INSTALLATION SQUAD,LLC'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO THE AMENDED COMPLAINT**

Come Now Defendant, Installation Squad, LLC, by and through undersigned counsel, pursuant to Federal Rules of Civil Procedure, and hereby files Defendant's Motion for Extension of Time to Answer the Complaint and in support thereof state as follows:

1. Plaintiff filed his Complaint in State Court on January 22, 2025.
2. On March 18, 2025, Co-Defendant Mastec removed the matter to the present court.
3. On April 1, 2025, Plaintiff filed an amended complaint.
4. Installation Squad's response is due within 21 days of April 1, 2025 or no later than April 22, 2025.
5. Installation Squad is not based in Texas and does not maintain an office in Texas.
6. Installation Squad has made many attempts to seek local counsel in the district but has not retained counsel in this district.

7. Installation Squad requires additional time to retain local counsel to represent them in this matter.

8. Installation Squad respectfully requests an additional 10 days to retain counsel.

Wherefore, Defendant respectfully requests this Honorable Court enter an Order granting this Motion for extension to allow Defendants through May 1, 2025 to file a response to the complaint.

Dated: April 21, 2025

Respectfully Submitted,

s/ Franz Spasic

Franz Spasic on behalf of Installation Squad
6411 SW 195th Avenue,
Fort Lauderdale Florida 33332

Certificate of Service

I hereby certify that a true and correct copy of Defendant's Motion for Extension of Time was sent via email to:

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s/ Franz Spasic

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